

REDACTED COPY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
DEL RIO DIVISION

FILED

2015 DE -2 AM 10:45

UNITED STATES OF AMERICA

CAUSE NO.:

WESTERN DISTRICT OF TEXAS  
U.S. CLERK'S OFFICE

INDICTMENT

BY:

DEPUTY

v.

JUAN CARRILLO,  
ROSA LIDIA CARRILLO

[VIO: COUNT ONE: 8 U.S.C. §  
1324(a)(1)(A)(v)(I) & (B)(i) -  
Conspiracy to Transport Illegal Aliens;  
COUNT TWO & THREE: 8 U.S.C. §  
1324(a)(1)(A)(ii)&(B)(ii) - Illegal Alien  
Transportation.]

**DR 15 CR 1507**

THE GRAND JURY CHARGES:

COUNT ONE

[8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(i)]

On or about November 8, 2015, in the Western District of Texas, Defendants,

JUAN CARRILLO,  
ROSA LIDIA CARRILLO,

did knowingly and intentionally combine, conspire, confederate and agree together and with others known and unknown to the Grand Jury, to commit the following offense against the United States: to transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact said aliens came to, entered, and remained in the United States in violation of law, and in furtherance of such violation of law, all in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I) and (B)(i).

COUNT TWO

[8 U.S.C. § 1324(a)(1)(A)(ii) & (B)(ii)]

On or about November 8, 2015, in the Western District of Texas, Defendants,

JUAN CARRILLO,

ROSA LIDIA CARRILLO,

did knowingly and in reckless disregard of the fact that the hereinafter named alien has come to, entered and remained in the United States in violation of law, willfully and unlawfully transported and moved, and attempted to transport and move, by means of transportation or otherwise, in furtherance of such violation of law, a certain alien, to-wit: Nilzon Avalos-Herrera, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(ii).

COUNT THREE

[8 U.S.C. § 1324(a)(1)(A)(ii) & (B)(ii)]

On or about November 8, 2015, in the Western District of Texas, Defendants,

JUAN CARRILLO,  
ROSA LIDIA CARRILLO,

did knowingly and in reckless disregard of the fact that the hereinafter named alien has come to, entered and remained in the United States in violation of law, willfully and unlawfully transported and moved, and attempted to transport and move, by means of transportation or otherwise, in furtherance of such violation of law, a certain alien, to-wit: Yony Fernando Castro-Cruz, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(ii).

A TRUE BILL.

FOREPERSON

RICHARD L. DURBIN, JR.  
United States Attorney

By: 

MATTHEW H. WATTERS  
Assistant United States Attorney

By: 

TODD R. KEAGLE  
Assistant United States Attorney

SEALED:  
UNSEALED: XX

**DR15CR1507**

**PERSONAL DATA SHEET  
UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
DEL RIO DIVISION**

COUNTY: DIMMIT USAO #: 2015R17841  
DATE: DECEMBER 2, 2015 MAG. CT. #: DR15-10366M  
AUSA: MATTHEW H. WATTERS & TODD R. KEAGLE  
DEFENDANT: JUAN CARRILLO  
CITIZENSHIP: UNITED STATES  
INTERPRETER NEEDED: NO LANGUAGE: ENGLISH  
DEFENSE ATTORNEY: EDUARDO P. SILLAS  
ADDRESS OF ATTORNEY: 8400 HOWARD DRIVE, HOUSTON, TX 77017  
DEFENDANT IS: DETAINED DATE OF ARREST: NOVEMBER 8, 2015  
BENCH WARRANT NEEDED: NO  
PROBATION OFFICER: N/A  
NAME AND ADDRESS OF SURETY: N/A  
YOUTH CORRECTIONS ACT APPLICABLE: NO  
PROSECUTION BY: INDICTMENT  
OFFENSE: (Code & Description): COUNT 1: 8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(i) -  
CONSPIRACY TO TRANSPORT ILLEGAL ALIENS; COUNTS 2 & 3: 8 U.S.C. §  
1324(a)(1)(A)(ii) & (B)(ii) - TRANSPORTATION OF ILLEGAL ALIENS.  
OFFENSE IS: FELONY  
MAXIMUM SENTENCE: FOR COUNT ONE - 10 YEARS IMPRISONMENT; UP TO  
\$250,000 FINE; UP TO 3 YEARS OF SUPERVISED RELEASE; \$100 MANDATORY  
SPECIAL ASSESSMENT; \$5000 SPECIAL ASSESSMENT NON-INDIGENT; FOR  
COUNTS 2-3 - 5 YEARS IMPRISONMENT; UP TO \$100,000 FINE; UP TO 3 YEARS OF  
SUPERVISED RELEASE; \$100 MANDATORY SPECIAL ASSESSMENT; \$5000 SPECIAL  
ASSESSMENT NON-INDIGENT.  
PENALTY IS MANDATORY: YES & NO  
REMARKS: SEE ABOVE  
W/DT-CR-3

SEALED:  
UNSEALED: XX

**DR 15 CR 1507**

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WESTERN DISTRICT OF TEXAS  
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CITIZENSHIP: UNITED STATES  
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DEFENSE ATTORNEY: ROGELIO J. PEREZ  
ADDRESS OF ATTORNEY: 8400 HOWARD DRIVE, HOUSTON, TX 77017  
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COUNTS 2-3 - 5 YEARS IMPRISONMENT; UP TO \$100,000 FINE; UP TO 3 YEARS OF  
SUPERVISED RELEASE; \$100 MANDATORY SPECIAL ASSESSMENT; \$5000 SPECIAL  
ASSESSMENT NON-INDIGENTPENALTY IS MANDATORY: YES & NO  
REMARKS: SEE ABOVE W/DT-CR-3